



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ENVIRONMENTAL CLEANUP

September 21, 2009

Karen Tarnow, Portland Harbor Stormwater Coordinator  
NWR Cleanup Section  
Department of Environmental Quality  
Northwest Region Portland Office  
2020 SW 4<sup>th</sup> Avenue, Suite 400  
Portland, Oregon 97201-5263

RE: Review of Source Control Decision  
Anderson Brothers Inc.  
9111 N. Vancouver Avenue  
Portland, OR 97217  
ECSI #970

Dear Ms. Tarnow:

EPA has reviewed DEQ's Source Control Decision (SCD) Memorandum for the Anderson Brothers Inc. site referenced above. Based on the information provided in this document, EPA cannot agree with DEQ's determination that this facility has been adequately characterized and that sources of contamination have been adequately eliminated or controlled. Until the following questions and comments regarding this source control decision are addressed, EPA will consider the Anderson Brothers Inc. site as a potential source of contamination to the Portland Harbor Superfund Site. We provide the following comments for DEQ to consider in proceeding forward with its decisions regarding this site.

1. DEQ's investigation of the contamination on the property has been solely focused on petroleum related contamination. Based on the information provided by DEQ, Wohlers Environmental Services, Inc., and Anderson Brothers, Inc., EPA agrees that the majority of the petroleum related contamination has been removed from the site (i.e., upland soils and storm water system) and that further investigation of petroleum related contamination is a low priority for this site. Further, EPA agrees, based on the information presented, that petroleum contaminated groundwater from this site is an insignificant pathway.
2. EPA disagrees with DEQ that there were "...relatively minor exceedances of several contaminant screening level values (SLVs)..." Based on the data provided, several contaminants were more than one to two orders of magnitude above SLVs. In Table 1 for stormwater solids phase, cadmium was 13 times the SLV, lead was 100 times the SLV, total PCBs was 170 times the SLV, phenol was 22 times the SLV, and bis(2-ethylhexyl)phthalate was 73 times the SLV. In Table 2 for stormwater aqueous phase, arsenic was 10 times the SLV, lead was 10 times the SLV, heptachlor was 130 times the SLV, 4,4-DDT was

20 times the SLV, and dieldrin was 65 times the SLV. These contaminants are consistent with historical operations at this site. While DEQ had the facility's storm system cleaned out, EPA is still concerned that the source of these contaminants are still uncharacterized on the property and may be released in the future. Further, there may be additional contamination in the City's OF-19 system between the site and the river that may continue to be a source of contamination to the Willamette River.

3. The Stormwater best management practices are focused on solids and oil removal, yet several contaminants exceeded SLVs in the aqueous phase and not in the solids phase; thus, these practices will not control the releases of contaminants that were found in the aqueous phase (i.e., arsenic, heptachlor, DDT and dieldrin).
4. Cleaning of catch basins once per year may not be sufficient to control solids. The frequency of cleaning should be site specific and there should be a requirement to conduct and document frequent (i.e., monthly) inspections of catch basins and remove material more frequently, if necessary. Further, material removed should be sampled for COCs (i.e., those constituents in Table 1 and Table 2) to ensure that the BMPs are effective in controlling contaminant sources.
5. Installation of the filters will only be effective until they clog. Once this occurs, the TSS will bypass the filter. The BMP only states that they replace these annually, which may be insufficient to control TSS related contaminants. The frequency of removal should be site specific and there should be a requirement to conduct and document frequent (i.e., monthly) inspections of filters and remove if they are clogged. Further, material removed by the filter should be sampled for contaminants of concern COCs (i.e., those constituents in Table 1) to ensure that the BMPs are effective in controlling contaminant sources.
6. It is unclear from the Stormwater BMP for sweeping if they are to conduct wet sweeping or dry sweeping, or what type of sweeping apparatus they are to use. Further, there is no evidence that sweeping is an effective BMP, although some studies indicate that wet sweeping is more effective than dry sweeping.
7. It appears that the installation of the rice wattles is to capture sediment in storm water leaving the site in sheet flow to the ODOT catch basins. Since an earlier statement was made that "[t]he overland flow pathway is not considered complete because stormwater is captured by onsite catch basins and ODOT catch basins...", EPA assumes that DEQ means that the overland flow to the river. EPA is unsure about the effectiveness of the rice wattles and would expect that continual inspections, solids removal and analysis, and maintenance will be required, although this was not specified in the BMP. EPA could not find any data for the ODOT catch basins, so it is unclear what measure of effectiveness would be expected with regard to COCs for this site.
8. EPA is concerned about the long-term effectiveness of the storm water BMPs. There is no enforcement mechanism to ensure that these management practices are implemented and effective.

EPA appreciates DEQs understanding in the additional week used to provide these comments. If you have any questions regarding this letter or would like to have further discussions regarding this site, please feel free to contact me by phone at (206) 553-6705 or by email at [koch.kristine@epa.gov](mailto:koch.kristine@epa.gov).

Sincerely,

Kristine Koch  
Remedial Project Manager  
U.S. Environmental Protection Agency